

Bulletin

Division of Food Safety
State of Wisconsin, USA

July 13, 2001 p. 1

Wisconsin Steps Up Food Allergen Safety Plans

A. An Important Issue

As you may be aware, the issue of food allergens has become a frequent topic of discussion among food processors, regulators and consumers. The purpose of this bulletin is to apprise you of the Division of Food Safety's (DFS) philosophy concerning food allergens, and its activities in the coming months.

For a small percentage of consumers, a particular food allergen can trigger severe anaphylactic reactions that bring on illness and,

sometimes, death. To avoid illness, those consumers must have information that allows them to avoid the particular allergens that affect them. In most cases, a food's label is the consumer's primary source of information. For a food product label to be accurate, the label must clearly state the ingredients contained in the product. In addition, accurate labeling depends on proper food processing procedures to assure that undeclared ingredients are not inadvertently added to the product.

B. Federal-State Partnership

The food allergens issue is not new to the DFS. In October of 1999, our Division entered into a partnership with the federal Food & Drug Administration to make a sample review of food allergens in the production of candy, ice cream and baked goods in Wisconsin. The products of 45 food processors were tested for egg and peanut allergens and the result showed a significant rate of non-compliance: 25 percent tested positive for undeclared allergens. (At the same time, the State of

Minnesota and the FDA had a similar partnership.)

We took this initial study as an opportunity to provide corrective information and consultation about good manufacturing practices with those not in compliance. We also reinforced the good food handling and labeling practices of those businesses found in compliance. Upon reinspection, all of the participating facilities passed. That experience has helped us plan how to move forward.

C. Broader Action

As you may know, the FDA recently announced plans to begin inspecting for food allergens across the nation. That plan – in concert with the voluntary guidelines issued in May by trade associations – shines a spotlight on food allergies for the public. Clearly, now is a prime time to raise the level of safety for food allergens in Wisconsin.

Indeed, part of the responsibility for protecting allergen-sensitive

individuals is in the consumer's hands. And in order to take precautions to protect itself by reading labels and avoiding allergenic food products, the public must first be aware of the issue. To that end, the DFS has created a new consumer fact sheet to be distributed at public education events such as the Wisconsin State Fair.

D. Industry Responsibility

Part of the burden also rests with you as a food processor. The

(continued on page two)

Bulletin

Division of Food Safety
State of Wisconsin, USA
July 13, 2001 p.2

Food Allergen Plans (continued)....

proper labeling of products is basic, and that issue cannot be more significant anywhere than in the area of food allergens. As you know, it is the food manufacturer's responsibility to ensure that all products are labeled accurately. The presence of an undeclared allergen causes it to be declared misbranded and adulterated. Therefore, the presence of that allergen will prompt a request for product recall.

Components of that issue must be addressed to solve the larger problem. Clear and simple vo-

cabulary, for example, provides consumers with a label they can easily understand. The Division is aware that many food processors have already moved to eliminate allergen problems through proper labeling along with good manufacturing practices to address handling issues such as separation and processing sequence. We are also aware that smaller processors may have greater challenges to coming into compliance.

E. Our Action Plan

Wisconsin is "ahead of the game"

with regard to food allergens due to our demonstrated interest in the issue and the above-mentioned partnership. We are asking for your active collaboration to maintain our state as a leader in food safety. Currently, the DFS is working on several pieces of an allergen plan:

- revision of policy guidelines on food allergens
- redesign inspection forms to include a set of allergen "check-offs"
- creation of fact sheets for the general public and staff
- expanded staff training

F. Resources for Improvement

While it is up to you, the processor, to meet safe food standards, the DFS can help. The Division's technical staff is available for consultation and information-sharing about system design, rework, cleaning, etc. As indicated above, staff training this fall will include updated materials, and those materials can be shared with you. Our Division also receives regular updates from the FDA, and can share, for example, the allergen-related "Guide to Inspections" issued in April.

Obviously, sharing policy and procedural information on a professional level can be quite helpful too. If you belong to a trade association that has not yet put food allergens high on its agenda, initiate the discussion.

I thank you for your attention, and your dedication to keeping our state's food supply safe for food allergy-affected residents, and visitors, of Wisconsin.

Steve Steinhoff
Division Administrator

